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*Attorneys for Plaintiffs and all others
 similarly situated*

Attorneys for Defendant Beiersdorf, Inc.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

PATRICIA TERRY, MARQUINITA
 TERRY, AND TAANYKA TERRY, on
 behalf of themselves and all others
 similarly situated,

Plaintiffs,

v.

BEIERSDORF, INC. a Delaware
 Corporation, and DOES 1-10, inclusive,

Defendants.

) Case No. C 11-05244 - SBA
)
)
)
)

**PARTIES' JOINT STIPULATION TO
 STAY CASE AND [PROPOSED] ORDER**

) Date/Time: March 20, 2012 at 1:00 p.m.
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)
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) Complaint Filed: October 27, 2011
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) Trial Date: None
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WHEREAS, on February 8, 2012, Defendant Beiersdorf, Inc. (“Beiersdorf”) filed a motion for a temporary stay on the grounds that it had reached a settlement in a case pending in Cook County, Illinois (*Amy Joseph, et al. v. Beiersdorf North America, Inc. and Beiersdorf, Inc.*, No. 11 CH 20147) that would resolve the claims pending in this action, *see* Dkt. 26;

WHEREAS, on February 27, 2012, plaintiffs opposed Beiersdorf’s motion on the grounds that the settlement had not received preliminary approval, *see* Dkt. 27;

WHEREAS, on February 9, 2012, the Court granted Beiersdorf’s motion and stayed this action until April 26, 2012, *see* Dkt. 28;

WHEREAS, on March 2, 2012, the *Joseph* court granted preliminary approval to the settlement and enjoined members of the settlement class from prosecuting or litigating claims that were or could have been asserted in *Joseph*, *see Joseph* Preliminary Approval Order (Ex. A);

WHEREAS, in light of the preliminary approval order in *Joseph*, plaintiffs and defendants agree that this action should be stayed until after the final approval hearing in *Joseph*, which is scheduled for June 15, 2012;

The parties hereby stipulate to continue the case management conference currently set for April 26, 2012 until sometime after June 15, 2012 and further stipulate to stay this action until such case management conference occurs.

Respectfully submitted,

Dated: March 12, 2012

SIDLEY AUSTIN LLP

By: /s/ Samuel R. Miller

Samuel R. Miller, Esq.
Counsel for Beiersdorf, Inc.

Dated: March 12, 2012

KIRTLAND & PACKARD LLP

By: /s/ Behram V. Parekh

Behram V. Parekh, Esq.
Counsel for Plaintiffs and all others similarly situated

SIGNATURE ATTESTATION

Pursuant to General Order No. 45(X)(B), I hereby attest that I have on file written permission to sign this joint motion from all parties whose signatures are indicated by a conformed signature (/s/) within this e-filed document.

Dated: March 12, 2012

SIDLEY AUSTIN LLP,

/s/ Samuel R. Miller

Samuel R. Miller, Esq.

Counsel for Beiersdorf, Inc.

[Proposed] Order

Pursuant to Stipulation, it is so Ordered.

IT IS FURTHER ORDERED THAT the telephonic Case Management Conference currently scheduled for April 26, 2012 is CONTINUED to **June 28, 2012 at 2:30 p.m.** Prior to the date scheduled for the conference, the parties shall meet and confer and prepare a joint Case Management Conference Statement. Plaintiff is responsible for filing joint statement no less than seven (7) days prior to the conference date. The joint statement shall comply with the Standing Order for All Judges of the Northern District of California and the Standing Orders of this Court. Plaintiff is responsible for setting up the conference call, and on the specified date and time, shall call (510) 637-3559 with all parties on the line.

Dated: March 13, 2012


THE HONORABLE SAUNDRA BROWN ARMSTRONG
United States District Judge